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June 1, 2021

*Via ECF*

Hon. Peggy Kuo, U.S.M.J.  
U.S. District Court, E.D.N.Y.  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: *Novagold Resources Inc. v. J Capital Research USA LLC*, No. 20-cv-02875-LDH-PK**  
***Reply Re: First Request for Extension of Time To Respond to Motion To Compel***

Dear Magistrate Judge Kuo,

To reply to Plaintiff's opposition to our request for a one-week extension of time to respond to Plaintiff's motion to compel (Dkts. 57-58):

J Capital timely raised its reporter's privilege objections to Plaintiff's discovery demands in November 2020. Plaintiff chose not to bring these issues to the fore until months later. We have been working very diligently on this case since its outset, and Plaintiff's opposition totally mischaracterizes how discovery has proceeded.

I also informed Plaintiff's counsel this morning that apart from our unexpected Supreme Court briefing deadline, Mr. Korzenik also now has a family medical issue to deal with this week. It is improper for Novagold to fight over literally two days, particularly when our proposed one-week extension (and fully briefing any cross-motion on reporter's privilege issues) will not affect any other scheduled dates. We again appreciate Your Honor's consideration.

Respectfully,

/s/Terence P. Keegan  
Terence P. Keegan

cc: Counsel of Record by ECF